

**ARTHUR I. UNGERMAN**  
**JOYCE W. LINDAUER**  
Attorneys at Law  
8140 Walnut Hill Lane  
Suite 301  
Dallas, Texas 75231  
(972) 239-9055 Telephone  
(972) 239-9886 Facsimile  
[arthur@arthurungerman.com](mailto:arthur@arthurungerman.com)  
[joyce@joycelindauer.com](mailto:joyce@joycelindauer.com)

Attorneys for Debtor

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<b>IN RE:</b>	§	
	§	
<b>SHAWNEE HOSPITALITY, LLC,</b>	§	<b>CASE NO: 10-43828</b>
	§	
<b>Debtor.</b>	§	<b>CHAPTER 11</b>
	§	
	§	<b>Hearing: July 11, 2011 at 10:30 A.M.</b>

**DEBTOR'S WITNESS AND EXHIBIT LIST  
FOR HEARING ON CONFIRMATION OF  
DEBTOR'S AMENDED PLAN OF REORGANIZATION DATED MAY 25, 2011**

**TO THE HONORABLE UNITED STATES BANKRUPTCY COURT:**

**COMES NOW SHAWNEE HOSPITALITY, LLC** (the "Debtor"), the Debtor in the above styled case and files this Witness and Exhibit List for Hearing on Confirmation of Debtor's Amended Plan of Reorganization Dated May 25, 2011.

**I. WITNESSES**

Debtor reserves the right to call the following witnesses to testify at the above referenced hearings. Debtor reserves the right to call any witness designated by Community South Bank or any party in interest in the above referenced bankruptcy case. Debtor further reserves the right to call witnesses as required to rebut the testimony of any witness.

1. Jagmohan Dhillon;
2. Any and all witnesses designated by all other parties.

## II. EXHIBITS

Debtor reserves the right to introduce the following exhibits at the above referenced hearings. Debtor reserves the right to introduce any exhibit designated by Community South Bank or any other party in interest in the bankruptcy case. Debtor further reserves the right to introduce any evidence necessary for rebuttal.

1. Amended Plan of Reorganization Dated May 25, 2011 (*docket no. 60*);
2. Amended Disclosure Statement Dated May 25, 2011 with Exhibits (*docket no. 61*);
3. Modification to Amended Plan of Reorganization Dated May 25, 2011 (*docket no. 71*);
4. Any and all exhibits designated by all other parties.

Debtor reserves the right to amend or supplement this list to that extent permitted by the Court.

DATED: July 6, 2011

Respectfully submitted,

ARTHUR UNGERMAN  
State Bar No. 20391000  
JOYCE LINDAUER  
State Bar No. 21555700  
Attorneys at Law  
8140 Walnut Hill Lane  
Suite 301  
Dallas, Texas 75231  
(972) 239-9055 Telephone  
(972) 239-9886 Facsimile  
[joyce@joycelindauer.com](mailto:joyce@joycelindauer.com)  
[arthur@arthurungerman.com](mailto:arthur@arthurungerman.com)

By: /s/ Arthur Ungerman  
Arthur Ungerman  
State Bar No. 20391000

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on or before July 6, 2011 a true and correct copy of the foregoing Witness and Exhibit List was sent by electronic filing to all persons receiving electronic notice and/or electronic mail to all interested parties not receiving electronic notice. On July 6, 2011 was sent to:

**Jeffrey R. Erler**  
Bell Nunnally & Martin LLP  
1400 One McKinney Plaza  
3232 McKinney Avenue  
Dallas, Texas 75204  
[jeffe@bellnunnally.com](mailto:jeffe@bellnunnally.com)

/s/ Arthur Ungerman  
Arthur Ungerman